April 11, 2005

MEMORANDUM TO: C. William Reamer, Director
Division of High-Level Waste Repository Safety
Office of Nuclear Material Safety
and Safeguards

FROM: Robert M. Latta, Senior Site Representative **/RA/**
Fuel Cycle & Decommissioning Branch
Division of Nuclear Material Safety
Region IV

Jack D. Parrott, Senior On-Site Licensing Representative **/RA/**
Project Management Section A
Division of High-Level Waste Repository Safety
Office of Nuclear Material Safety
and Safeguards

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION ON-SITE LICENSING REPRESENTATIVES' REPORT ON THE YUCCA MOUNTAIN PROJECT FOR JANUARY 1, 2005, THROUGH FEBRUARY 28, 2005

The purpose of this memorandum is to transmit the U.S. Nuclear Regulatory Commission (NRC) On-Site Representatives' (ORs') report for the period of January 1, 2005, through February 28, 2005.

This report highlights a number of Yucca Mountain Project activities of potential interest to NRC staff. The ORs continue to respond to requests from NRC Headquarters staff to provide various documentation and feedback related to Key Technical Issues (KTIs) and their resolution. During this reporting period, the ORs continued to observe activities associated with Yucca Mountain site activities, KTIs, and audits. The ORs also attended various meetings and accompanied NRC staff on visits to Yucca Mountain.

In accordance with 10 CFR 2.390 of the NRC's "Rules of General Applicability," a copy of this letter will be available electronically in the NRC Public Document Room or from the Publically Available Records component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

If you have any questions on this report or its attachments, please call Robert Latta on (702) 794-5048, or Jack Parrott on (702) 794-5047.

Attachments:
1. U.S. Nuclear Regulatory Commission On-Site Licensing Representatives' Report Number OR-05-01 for the Reporting Period of January 1, 2005, through February 28, 2005
2. Table 1: U.S. NRC On-Site Licensing Representatives' Tracking Report for Open Items Followed in Bi-Monthly OR Report

cc: See attached list.

Memorandum to C. W. Reamer from R. Latta and J. Parrott, dated: April 11, 2005
cc:

A. Kalt, Churchill County, NV
L. Pearce, Churchill County, NV
R. Massey, Churchill/Lander County, NV
I. Navis, Clark County, NV
E. von Tiesenhausen, Clark County, NV
J. Gervers, Clark County, NV
W. Kirby, Esmeralda County, NV
G. McCorkell, Esmeralda County, NV
R. Damele, Eureka County, NV
L. Marshall, Eureka County, NV
A. Johnson, Eureka County, NV
A. Remus, Inyo County, NV
M. Yarbro, Lander County, NV
J. Brandt, Lander County, NV
R. Hammon-Hornbeck, Lincoln County, NV
G.T. Rowe, Lincoln County, NV
L. Rasura, Lincoln County, NV
M. Baughman, Lincoln County, NV
A. Robinson, Lincoln County, NV
L. Mathias, Mineral County, NV
D. Swamson. Nye County, NV
C. Trummell, Nye County, NV
G. Hollis, Nye County, NV
D. Hammermeister, Nye County, NV
M. Simon, White Pine County, NV
J. Ray, NV Congressional Delegation
M. Henderson, NV Congressional Delegation
BJ Vonderheide, NV Congressional Delegation
T. Story, NV Congressional Delegation
R. Herbert, NV Congressional Delegation
R. Lambe, NV Congressional Delegation
S. Joya, NV Congressional Delegation
K. Kirkeby, NV Congressional Delegation
K. Finfrock, NV Congressional Delegation
R. Loux, State of NV
S. Frishman, State of NV
S. Lynch, State of NV
P. Guinan, Legislative Counsel Bureau
M. Plaster, City of Las Vegas
M. Jordan, City of N. Las Vegas
M. Murphy, Nye County, NV
B. J. Garrick, NWTRB
J. Treichel, Nuclear Waste Task Force
P. Johnson, Citizen Alert
P. Lister, Shundahai Network
T. J. Garrish, DOE/Washington, D.C.
G. Runkle, DOE/Washington, D.C.
C. Einberg, DOE/Washington, D.C.
S. Gomberg, DOE/Washington, D.C.
J. Arthur, DOE/ORD, Las Vegas, NV
R. Dyer, DOE/ORD, Las Vegas, NV
A. Benson, DOE/ORD, Las Vegas, NV
J. Ziegler, DOE/ORD, Las Vegas, NV
A. Gil, DOE/ORD, Las Vegas, NV
W. Boyle, DOE/ORD, Las Vegas, NV
D. Brown, DOE/OCRWM, Las Vegas, NV
S. Wade, DOE/ORD, Las Vegas, NV
C. Hanlon, DOE/ORD, Las Vegas, NV
T. Gunter, DOE/OCRWM, Las Vegas, NV
N. Hunemuller, DOE/ORD, Las Vegas, NV
M. Van Der Puy, DOE, Las Vegas, NV
J. Williams, DOE, Las Vegas, NV
R. Craun, DOE/ORD, Las Vegas, NV
A. Capoferri, DOE, Las Vegas, NV
J. Mitchell, BSC/SAIC, Las Vegas, NV
M. Mason, BSC/SAIC, Las Vegas, NV
S. Cereghino, BSC/SAIC, Las Vegas, NV
E. Mueller, BSC/PR, Las Vegas, NV
D. Beckman, BSC/B&A, Las Vegas, NV
R. Hassan, NQS, Las Vegas, NV
E. Opelski, NQS, Las Vegas, NV

cc' continued:

R. Huey, BSC, Las Vegas, NV

J. Bess, BSC/SAIC, Las Vegas, NV

J. Birchim, Yomba Shoshone Tribe

R. Holden, NCAI

R. Clark, EPA

R. Anderson, NEI

R. McCullum, NEI

S. Kraft, NEI

J. Kessler, EPRI

D. Duncan, USGS

R. Craig, USGS

W. Booth, Engineering Services, LTD

L. Lehman, T-REG, Inc.

S. Echols, ECG

C. Marden, BNL, Inc.

J. Bacoch, Big Pine Paiute Tribe of the Owens Valley

T. Kingham, GAO

D. Feehan, GAO

E. Hiruo, Platts Nuclear Publications

G. Hernandez, Las Vegas Paiute Tribe

R. Arnold, Pahrump Paiute Tribe

G. Hudlow, Public Citizen

A. Elzeftawy, Las Vegas Paiute Tribe

R. Murry, MTS

B. Helmer, Timbisha Shoshone Tribe

W. Briggs, Ross, Dixon & Bell

C. Myers, Maopa Paiute Indian Tribe

R. Wilder, Fort Independence Indian Tribe

D. Vega, Bishop Paiute Indian Tribe

J. Egan, Egan, Fitzpatrick & Malsch

J. Leeds, Las Vegas Indian Center

J. C. Saulque, Benton Paiute Indian Tribe

C. Bradley, Kaibab Band of Southern Paiutes

R. Joseph, Lone Pine Paiute-Shoshone Tribe

L. Tom, Paiute Indian Tribes of Utah

E. Smith, Chemehueivi Indian Tribe

D. Buckner, Ely Shoshone Tribe

D. Eddy, Jr., Colorado River Indian Tribes

V. Guzman, Inter-Tribal Council of NV (Chairwoman, Walker River Paiute Tribe)

H. Jackson, Public Citizen

P. Thompson, Duckwater Shoshone Tribe

S. Devlin, Public Citizen

D. Irwin, Hunton & Williams

J. Donnell, MTS

R. Boland, Timbisha Shoshone Tribe

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This report highlights a number of Yucca Mountain Project activities of potential interest to NRC staff. The ORs continue to respond to requests from NRC Headquarters staff to provide various documentation and feedback related to Key Technical Issues (KTIs) and their resolution. During this reporting period, the ORs continued to observe activities associated with Yucca Mountain site activities, KTIs, and audits. The ORs also attended various meetings and accompanied NRC staff on visits to Yucca Mountain.

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cc: See attached list.

DISTRIBUTION:

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ML050810417 *See Previous Concurrence

OFC	DNMS/FCDB	HLWRS	TECH ED	HLWRS	OGC	HLWRS	HLWRS
NAME	RLatta*	JParrott*	EKraus*	FBrown	JMoore*	ECollins	CWReamer
DATE	03/15/05	03/15/05	03/21/05		04/06/05	04/08/05	04/11/05

U.S. NUCLEAR REGULATORY COMMISSION
ON-SITE LICENSING REPRESENTATIVES' REPORT
NUMBER OR-05-01
FOR THE REPORTING PERIOD OF
JANUARY 1, 2005, THROUGH FEBRUARY 28, 2005

Attachment 1

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U.S. NUCLEAR REGULATORY COMMISSION
ON-SITE LICENSING REPRESENTATIVES' REPORT
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FOR THE REPORTING PERIOD OF JANUARY 1, 2005, THROUGH FEBRUARY 28, 2005

PAGE

ACRONYMS AND ABBREVIATIONS

ACRO	TITLE
BSC	Bechtel SAIC Company, LLC
CAP	Corrective Action Program
CAQ	Conditions Adverse to Quality
CR	Condition Report
DOE	U.S. Department of Energy
FEPS	Features, Events, or Processes
KTI	Key Technical Issue
LA	License Application
NWR	National Wildlife Refuge
NRC	U.S. Nuclear Regulatory Commission
OQA	Office of Quality Assurance
OR	On-Site Representative
PA	Performance Assessment
QA	Quality Assurance
QARD	Quality Assurance Requirements Description
ROK	Republic of Korea
SAT	Systematic Approach to Training

EXECUTIVE SUMMARY

SITE ACTIVITIES AND DATA ACQUISITION

During this reporting period, an On-Site Representative (OR) observed a test entitled "Testing of Stress Crack Flow." This test was performed to support Project arguments that dynamic flow of water through stress corrosion cracks, in material used for waste packages and drip shields, can be excluded as a Feature, Event, or Process to be considered in a potential license application. See Section 1.

OUTREACH ACTIVITIES

During this reporting period, senior U.S. Nuclear Regulatory Commission (NRC) management and the NRC ORs met with officials from Nye County, Nevada, and toured Amargosa Valley, Nevada. Discussions held during the tour included those on the impacts on Nye County, in general, and Amargosa Valley, specifically, from a potential repository and what NRC could do to improve communication between the citizens or units of government in Nye County and NRC. See Section 2.

QUALITY ASSURANCE AND ENGINEERING

During this reporting period, an OR observed a Project-led Quality Assurance surveillance of the stress crack flow test, described in Section 1. Based on the OR's observations, it was determined that the surveillance team appropriately evaluated the Principal Investigator's implementation and use of the scientific notebook, and the measuring and test equipment used. No audit observation inquires were identified, and the OR determined that this oversight activity was appropriately performed. See Section 3.1.

OBSERVATION OF BECHTEL SAIC COMPANY, LLC "TRAINING PROGRAM AUDIT"

The ORs observed the conduct of "Bechtel SAIC Company, LLC (BSC) Training Program" audit. Based on the ORs' observations, it was determined that the audit team effectively evaluated the program controls associated with BSC's training and qualification process, and that the minor discrepancies identified during the audit were properly characterized. See Section 3.2.

OBSERVATION OF "CORRECTIVE ACTION PROGRAM" AUDIT

During this reporting period, the ORs observed the conduct of DOE's Office of Quality Assurance audit of the "Corrective Action Program" (CAP). Based on the results of the ORs' observations, it was determined that the audit team appropriately evaluated the effectiveness and implementation of the CAP process. See Section 3.3.

GENERAL ACTIVITIES

During this reporting period, an OR led two site visits. The first site visit included NRC's Deputy Executive Director for Information Services and Administration, who is also the Agency's Chief Information Officer. The second site visit included the Assistant Director General for Nuclear Safety from the Republic of Korea Ministry of Science and Technology, and the Director of the Nuclear Regulation Division of the Republic of Korea Institute of Nuclear Safety. See Section 4.

REPORT DETAILS

INTRODUCTION

The principal purpose of the On-Site Representatives' (ORs') report is to inform U.S. Nuclear Regulatory Commission (NRC) managers, staff, and contractors about information on the U.S. Department of Energy's (DOE) programs in repository design; performance assessment (PA); performance confirmation; and environmental studies that may be useful in fulfilling NRC's role during prelicensing consultation. The primary focus of this and future OR reports will be on DOE's programs for subsurface and surface-based testing, PA, data management systems, environmental studies, and quality assurance (QA). Relevant information includes new technical data, DOE's plans and schedules, and the status of activities to support preparation of the License Application (LA). The ORs also take part in activities associated with resolving NRC Key Technical Issues (KTIs). This report covers the period of January 1, 2005, through February 28, 2005.

OBJECTIVES

An OR's mission is to serve principally as a point of prompt information exchange and to identify preliminary concerns with site investigations and potential licensing issues. The ORs carry out this role by gathering and evaluating information, identifying concerns, and bringing more significant issues to NRC management's attention. Communication with DOE is accomplished by exchanging information on data, plans, schedules, documents, activities and pending actions, and resolution of issues. The ORs interact with DOE scientists, engineers, and managers, with input from NRC Headquarter's management, regarding NRC policies, programs, and regulations. The ORs also focus on such issues as design controls, data management systems, PA, and KTI resolution. A primary OR role is to identify areas in site studies, activities, or procedures that may be of interest or concern to the NRC staff.

1. SITE ACTIVITIES AND DATA ACQUISITION

On January 31, 2005, an OR observed a test that the Project was performing at the DOE-Nevada facilities in North Las Vegas. The test, entitled "Testing of Stress Crack Flow," was initiated to evaluate the potential of water flow through small cracks or crevices created in metal samples that are of similar physical characteristics with potential drip shield or waste package designs. This test was performed in support of Features, Events, or Processes (FEPs) screening arguments that exclude dynamic flow of water through stress corrosion cracks in material used for waste packages and drip shields in a potential repository. In the portion of the test observed by the OR, water flow through the cracks, created in some of the metal samples, was seen. Based on these partial observations, the experiment may not be able to support screening out the FEPs described above, however, these conclusions are tentative and are subject to change based on the final test results.

2. OUTREACH ACTIVITIES

On February 16, 2005, senior NRC management in Nevada for the quarterly NRC/DOE management meeting, and the ORs, met with officials from the Nye County, Nevada, Department of Natural Resources and Federal Facilities, and a Nye County

Commissioner, in County offices in Pahrump, Nevada. The group then toured Amargosa Valley, Nevada, the area south of the potential repository at Yucca Mountain. The tour included stops at the Devil's Hole portion of Death Valley National Park, the Ash Meadows National Wildlife Refuge (NWR), the Ponderosa Dairy, and the approximate location of the hypothetical "Reasonably Maximally Exposed Individual" (as described in 10 CFR 63.312). During the tour, discussions were held with personnel from the U.S. Fish and Wildlife Service, who have responsibility for Ash Meadows NWR, and the manager of the Ponderosa Dairy. The tour concluded at the western approach to Crater Flat, the area to the west of Yucca Mountain, to view a portion of the potential rail corridor for Yucca Mountain waste transportation. Discussions held during the tour included those about potential impacts on Nye County, in general, and Amargosa Valley, specifically, from a potential repository and what NRC could do to improve communication between the citizens or units of governments in Nye County and NRC.

3. QA AND ENGINEERING

3.1 Observation of QA Surveillance of the "Stress Crack Flow Test"

On February 15, 2005, an OR observed a Project QA surveillance of the stress crack flow test described in Section 1. For the surveillance, the activities related to the stress crack flow test were evaluated against the Project's procedures on initiating and controlling the notebooks that document scientific tests, and on the control of measuring and test equipment used for scientific tests. The conclusion of the surveillance was that the procedural requirements for scientific notebooks and the measuring and test equipment were being satisfactorily and effectively implemented during the performance of the surveillance. No conditions adverse to quality (CAQ) were identified during the surveillance and no condition reports were issued by the surveillance team.
Based on the OR's observations, it was determined that the surveillance team appropriately evaluated the Principal Investigator's implementation and use of the scientific notebook and the measuring and test equipment used. In addition, the OR observed that the surveillance team was well-prepared and effectively examined the documentation produced for, and equipment used in, the test. No audit observation inquires were identified, and the OR determined that this oversight activity was appropriately performed.

3.2 Observation of Bechtel SAIC Company, LLC Training Program Audit

The ORs observed the conduct of "Bechtel SAIC Company, LLC (BSC) Training Program" audit. The purpose of this compliance-based audit was to assess the systematic approach to training (SAT) process used for the development of the project training program and to evaluate implementation of associated training documents. The audit scope also included the evaluation of effectiveness of completed corrective actions related to previously identified condition reports (CRs).

The audit team examined the process controls and responsibilities for ensuring that personnel are trained and qualified to meet project requirements. The applicable procedure describes the SAT process that BSC uses to analyze training needs by job

function and to create task-related training program descriptions. To satisfy these requirements, BSC has developed a Training Program Description that identifies the minimum training and qualification necessary for each position in the organization. The audit team also evaluated the Training Management Plan, the Training Manual, and the implementing procedures for maintaining the BSC training database. Within the areas examined, only minor discrepancies were identified and the audit team concluded that the procedures and related training documents were adequate, and that implementation was satisfactory. The audit team also concluded that the corrective actions related to previously identified deficiencies in the training program were acceptable.

Based on the ORs' observations, it was determined that the audit team effectively evaluated the program controls associated with BSC's training and qualification process and that the minor discrepancies identified during the audit were properly characterized. No audit observation inquiries were identified, and the ORs determined that this oversight activity was appropriately performed.

3.3 Observation of Corrective Action Program Audit

During this reporting period, the ORs observed the conduct of DOE's Office of Quality Assurance (OQA) audit of the "Corrective Action Program" (CAP). The purpose of this performance-based audit was to evaluate the effectiveness and implementation of the CAP process in accordance with the applicable criteria defined in the Quality Assurance Requirements and Description (QARD). Specifically, the audit team examined CAP performance, personnel training, self-assessment results, CR process implementation, and follow-up actions associated with previous CRs.

To evaluate the adequacy of the CAP process, OQA's audit team examined selected program elements, including the CR initiation process. Within this area, the team determined that the management expectations for the CAP and CR initiation process were generally understood by BSC personnel. However, the audit team noted that for several months, the CR initiation rate has remained at approximately 12 percent, which is below the expected value. The audit team also evaluated the CAP performance measures related to timeliness of plan development and completed corrective actions. As a result of this evaluation, the team concluded that although there has been an improving trend in the plan completion dates for CRs, the completion goal of 60 days for CAQs has not been consistently achieved. Additionally, the audit team reviewed the processing activities related to Level C CRs. The results of this review indicated that CR descriptions, responses, and verification statements were satisfactory. However, the team identified that insufficient attention had been given to establishing and documenting the extent of conditions through evaluation of similar products, processes, and records. Specifically, the team identified instances were no extent evaluation had been documented and others examples were the evaluation had been deferred.

The audit team concluded that training, self-assessments, and the CR initiation process were adequately implemented and that the CAP satisfied current project requirements. The audit team also concluded that the corrective actions related to a previously documented CR were satisfactory. However, as a result of its reviews, the audit team identified a concern regarding inadequate extent of condition determinations related to CR processing.

Based on the results of the ORs' observations, it was determined that the audit team appropriately evaluated the effectiveness and implementation of the CAP process. No audit observations were identified and the audit team findings were appropriately documented.

4. GENERAL ACTIVITIES

4.1 Meetings

During this reporting period, the ORs participated in the following meetings:

- On February 10, 2005, Division of High-Level Waste Repository Safety staff, including the ORs, participated in a public Technical Exchange with DOE. The purpose for the Technical Exchange was for DOE to present its approach to responding to NRC staff's additional information needs regarding DOE's proposed QARD, Revision 17.

- On February 17, 2005, staff and senior managers from NRC and DOE met, in a public meeting, in Las Vegas, Nevada. The purpose of the meeting was to discuss management issues and progress regarding DOE's potential LA for a geologic repository at Yucca Mountain, Nevada. Video and audio connections were also available with connections to the Center for Nuclear Waste Regulatory Analyses, in San Antonio, Texas, and the NRC Headquarters in Rockville, Maryland. Various stakeholders and members of the public attended the meeting.

4.2 Yucca Mountain Site Visits

On January 24, 2005, an OR led a group of NRC management and staff, including the NRC's Deputy Executive Director for Information Services and Administration, who is also the Agency's Chief Information Officer, on a visit to the Yucca Mountain site.
On February 24, 2005, an OR, and a staff member of NRC's Office of International Programs, led a group to visit the Yucca Mountain site. The group included the Assistant Director General for Nuclear Safety, from the Republic of Korea (ROK) Ministry of Science and Technology, and the Director of the Nuclear Regulation Division of the ROK Institute of Nuclear Safety.

U.S. NRC ON-SITE LICENSING REPRESENTATIVES' TRACKING REPORT FOR OPEN ITEMS FOLLOWED IN BI-MONTHLY OR REPORT

Table 1

OPEN ITEM NUMBER (For Tracking only)	*BRIEF DESCRIPTION OF OPEN ITEM*	*OPEN ITEM OR REPORT NO.*	*DATE OPEN ITEM CLOSED*
AOI-YMSCO-ARC-02-12–01	Identifies the need for DOE OQA to ensure that procedure development and review process include a documented evaluation to verify compliance with the requirements of the YMP's QARD.	OR-03-01	OR Report No: OR-03-03 August 15, 2003
OR Open Item 04-01	A concern regarding the safety analysis of the ground support system in the ESF.	OR-04-01	OR Report No: OR-04-04 October 27, 2004
OR Open Item 03-06	Based on review of CR-756, 12 quality-affecting procedures were approved without meeting the applicable QARD requirements.	OR-03-05	OR Report No. OR-04-06 March 4, 2005
OR Open Item 03-05	The continued use of unqualified software in quality-affecting technical products appears to be in conflict with the governing requirements of the implementing procedures and the QARD.	OR-03-04	
OR Open Item 03-04	With a tentative date of mid-June to evaluate CAR BSC(B)-03-(C)-107, the RCD has not acted on this CAR in a timely manner and it has remained open for 4 months without resolution.	OR-03-03	OR Report No: OR-03-05 January 12, 2004
OR Open Item 03-03	An evaluation in DOE's progress in implementing corrective actions associated with CAR B.C.-01-C-001, concerning model validation, the OR reviewed TAPS (approx. 43 models). Based on the results, it could not be established if the evaluation criteria will result in the development of models with adequate confidence for the LA.	OR-03-02	
OR Open Item 03-02	During a review of the MII confirmation packages, it was identified that the action statement execution task descriptions and completion schedules for many of the reviewed pkgs had been modified without appropriate justification. Therefore, pending the resolution of this apparent deviation from a commitment to administer the MII in accordance with the requirements of AP-5.1Q, this issue is identified as this OR Open Item.	OR-03-02	OR Report No: OR-04-02 July 8, 2004

Attachment 2

U.S. NRC ON-SITE LICENSING REPRESENTATIVES' TRACKING REPORT FOR OPEN ITEMS FOLLOWED IN BI-MONTHLY OR REPORT

Table 1

OPEN ITEM NUMBER (For Tracking only)	*BRIEF DESCRIPTION OF OPEN ITEM*	*OPEN ITEM OR REPORT NO.*	*DATE OPEN ITEM CLOSED*
OR Open Item 03-01	This Open Item is based on issues on separate DRs: (1) the effective resolution of concerns related to inadequate personnel training; 2) the failure to establish an effective transition plan; and 3) the evaluation of the SCWE issues.	OR-03-01	OR Report No: OR-03-04 October 20, 2003
OR Open Item 02-13	The current status of corrective & preventive actions associated with CAR No. BSC-02-C-01 revealed that not all corrective actions stated had been complete.	OR-02-05	OR Report No: OR-03-05 January 12, 2004
OR Open Item 02-12	Contrary to requirements of the QARD Supplement III 2.4.C, AP-SIII.2Q inappropriately allows for the use of unqualified data. BSC QA procedure change control program failed to identify this issue.	OR-02-05	OR Report No. OR-04-06 March 4, 2005
OR Open Item 02-11	Based on surveillance not identifying specific problems with software functionality for codes tested, 7 - including NUFT, did not pass ITP and/or VTP surveillance.	OR-02-05	OR Report No: OR-03-06 February 18, 2004
OR Open Item 02-10	Pending appropriate evaluation and documentation of the design control attributes associated with requirements of 10 CFR 63.44 and 10 CFR Part 21.	OR -02-04	
OR Open Item 02-09	Pending revision of engineering procedures, to include appropriate design verification considerations.	OR-02-04	OR Report No: OR-03-06 February 18, 2004
OR Open Item 02-08	The required performance of annual audits' justification for delaying a scheduled audit of YMSCO for 3 months, with an additional extension, does not appear to be adequately supported. Deviation from requirement of sub-section 18.2.1E of the QARD.	OR-02-04	OR Report No: OR-02-06 January 23, 2003
OR Open Item 02-07	Model Validation Impact Assessment addressed the effect of inappropriately validated models on TSPA-SR. Many cases of impact assessments used TSPA-SR results to evaluate the local impacts. It's unclear how this practice evaluated the cumulative impact of all the models in question.	OR-02-01	OR Report No: OR-03-06 February 18, 2004
OR Open Item 02-06	Unqualified Data Impact Assessment - NRC staff identified unqualified data that could be replaced with qualified data for the performance assessment. For the risk-significant components, an evaluation of unqualified data replaced with qualified data would help determine if efforts should be undertaken to qualify the removed data.	OR-02-01	OR Report No: OR-04-02 July 8, 2004
OR Open Item 02-05	Provisions are in place that allow for model validation to continue past issuance of the documentation. The models used in the performance assessment should have adequate support for their representation at the time the performance assessment documentation is issued.	OR -02-01	OR Report No: OR-03-06 February 18, 2004

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OR Open Item 02-04	A number of criteria have been developed related to various forms of review. If a review is relied on for model validation, it should be directed at validating the model and it should encompass the full body of information to the extent practical.	OR-02-01	OR Report No: OR-03-01 April 14, 2003
OR Open Item 02-03	More objective criteria (comparison to data not used in the development of the model), typically resulting in higher confidence in model validation are not distinguished from the more subjective, problematic criteria.	OR-02-01	OR Report No: OR-03-02 June 11, 2004
OR Open Item 02-02	Current process controls specify that one or more of nine criteria may be used to validate a model. All the criteria should increase confidence in the modeling process, some criteria do not appear to be appropriate for addressing whether the model is valid for its intended use.	OR-02-01	OR Report No: OR-03-01 April 14, 2003
OR Open Item 02-01	Failure to properly include the specific issues identified in the Concerns Program Final Report in the resolution process may result in not adequately addressing the original employee's concern.	OR-02-01	OR Report No: OR-02-06 January 23, 2003